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September 25, 2024

MEMO ENDORSED
9/25/24**VIA ECF**The Honorable Colleen McMahon
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St
New York, NY 10007Re: **United States v. Rafat Amirov, S7 22 Cr. 438 (CM)**

Dear Judge McMahon:

I represent Mr. Rafat Amirov in the above-captioned matter. In this matter, all motions by the Government and the defendants are currently due on September 30, 2024. Pursuant to Rule 12(c)(2) of the Federal Rules of Criminal Procedure, all parties respectfully request that the time for filing motions be extended by 15 days, to and including October 15, 2024. This is the parties' first request for an extension of time to file motions. Good cause for such an extension includes the September 5, 2024 superseding indictment that added two new charges, the voluminous discovery, and the complicated electronic discovery counsel needs assistance in interpreting. In addition, counsel for Mr. Omarov has been on trial. This request includes extending the time the Government has to submit its CIPA motion, though we understand that the Government intends to file its motion prior to the adjusted October 15, 2024, deadline.

This extension request should not affect the previously scheduled dates in this case, including the January 16, 2025 status conference, and time has previously been excluded from the Speedy Trial clock through January 16, 2025.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Michael W. Martin
Lincoln Square Legal Services, Inc.
Attorney for Mr. Rafat Amirov

cc: All parties via ECF

